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CORRES. CONTROL
OUTGOING LTR NO.

JOE ORDER# 4700.1
94 RF 11898

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

DIST.	LTR	ENC
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BRANCH, D.B.		
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STEWART, D.L.		
STIGER, S.G.	X	
TOBIN, P.M.		
VOORHEIS, G.M.		
WILSON, J.M.		
Brown, M.G.	X	
Roberts, R.	X	
Robles, L.	X	
McCorkle, P.	X	
Haven, R.	X	
Hester, L.	X	
Demos, N.	X	
CORRES. CONTROL	X	X
ADMIN RECORD/0862		
TRAFFIC		
PATS/T130G		

November 30, 1994

94-RF-11898

Jessie M. Roberson
Acting Director of
Environmental Restoration

RECOMMENDATION FOR ADDITIONAL INVESTIGATION OF PROPOSED BUILDING LOCATION FOR THE INVESTIGATIVE DERIVED MATERIAL (IDM) STORAGE BUILDING -

Attn: N. I. Castaneda

Pursuant to telephone conversations with several Department of Energy, Rocky Flats Field Office (DOE, RFFO) extended staff members since the meeting held November 22, 1994, the scope of this letter has been revised from providing a complete list of options to providing recommendations regarding the recent discoveries affecting the construction schedule for the Investigative Derived Materials (IDM) building. It is EG&G Rocky Flats, Inc. strong recommendation to DOE, RFFO that the proposed building site be thoroughly investigated prior to construction. We are in receipt of several letters from the Environmental Protection Agency (EPA) and Colorado Department of Public Health & Environment (CDPH&E) which clearly object to the construction of buildings on potentially contaminated soils.

Our rationale for this recommendation is based on the following findings: The proposed foundation area for the building is situated on fill material deposited from approximately 1975 to 1980. The fill is determined to have come from the clay pits west of the plant boundary and has been sampled extensively. At several locations along the eastern boundary of the proposed site, chromium III (trivalent form based upon Programmatic Risk-based Remediation Goal studies for soils) was detected at levels significantly above background (347 ppm) when fully digested. Additional samples were collected from an area within the clay pit and are representative of the materials deposited at the IDM building site. Chromium was detected at background levels normally seen throughout the plant (22.3 ppm) in samples fully digested. This comparison suggests that a potential source for the chromium exists in the area of the proposed construction site and not associated with the natural deposition of the stratigraphic unit. In addition, borehole data from other projects in the Field Operations Yard have not had chromium hits. Toxicity Characteristic Leaching Procedure (TCLP) analysis from samples collected at the building site location indicates that the chromium is unlikely to leach under current conditions.

On November 8, 1994 an EG&G Rocky Flats, Inc. employee was noted as saying that miscellaneous debris including metal shavings and sweepings from a chrome plating laboratory in building 444 were routinely discarded in the Field Operations Yard from approximately 1970 to 1976. The employees recollection is unsubstantiated and the interview was informally conducted.

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IN REPLY TO RFP CC NO:

ACTION ITEM STATUS
☐ PARTIAL/OPEN
☐ CLOSED

LTR APPROVALS:

ORIG & TYPIST INITIALS
NSJ VSK

ADMIN RECCRD
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SW-A-003709

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Based upon these supporting facts, it is our recommendation that the proposed building site justifies further investigation to determine the source of the chromium and validate the possibility of discarded chromium sweepings in the area. Further investigation and proposed actions involve several specific tasks, 1) determine the necessity for preparing a Proposed Action Memorandum (PAM) to conduct further investigation through sampling the soil at depth to determine the source and lateral extent with the possibility of initiating an accelerated cleanup action, 2) prepare a risk assessment study for trivalent chromium in non-surficial soils to determine what risks there are to the environment and if any remedial investigation is warranted (several studies have been completed which may be utilized in this task), 3) fully investigate the available historical information and supporting analytical data to determine if the site is suitable for submittal in the Historical Release Report (HRR) Quarterly Update as a Potential Area of Concern (PAC) required under Section I.B.3 "Notification" of the Interagency Agreement (IAG), and 4) establish an expedited schedule for the above actions. As a first step, we will evaluate the possibility of reorientation of the building to allow site investigation to continue without impacting the existing construction schedule. Final decisions can be made as soon as possible for either continuation of existing construction schedules (including the regulatory process for building on a PAC if so deemed) or to re-establish a new building location. If a new building location is justified, EG&G Rocky Flats, Inc. is prepared to submit a relocation plan to justify the best option and justification for the additional cost due to scope and schedule impacts. We would like to stress that such a relocation would be unfortunate and will be considered as a last resort.

Pursuant to this investigation, our staffs will continue to work closely to resolve the immediate issue at hand and then make a decision based upon our findings. We would like to schedule a meeting as soon as possible to discuss these recommendations and viable options. A schedule will be the primary topic for this meeting.

Please feel free to contact me at extension 8570 or Nick Demos of my staff at extension 6938, digital page 3842.

L. A. Gregory-Frost

L. A. Gregory-Frost
Field Operations Manager
EG&G Rocky Flats, Inc.

Orig. and 1 cc - J. M. Roberson

cc:

B. M. McCarthy	-	SSCP
P. Pigeon	-	SSCP
J. Stewart	-	SSCP
B. I. Williamson	-	DOE, RFFO